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| 8 | Sacramento, California 95825 Telephone: (916) 444-5678 | | | | | |
| 9 | Attorneys for Plaintiffs | | | | | |
| 10 | | | | | | |
| 11 | UNITED STATES DISTRICT COURT | | | | | |
| 12 | EASTERN DISTRICT OF CALIFORNIA | | | | | |
| 13 | | | | | | |
| 14 | VERONICA MCLEOD, individually and as | Case No. 2:22-cv-00585-V | VBS-JDP | | | |
| 15 | successor in interest to decedent, DOLORES HERNANDEZ; AMADO HERNANDEZ, | Honorable William B. Shu | hh | | | |
| 16 | individually and as successor in interest to | Honorable William B. Shu | | | | |
| 17 | decedent, DOLORES HERNANDEZ; and YSIDRA REGALDO, individually, | PLAINTIFFS' PROPOS | FD VERDICT | | | |
| 18 | 1 SIDKA REGALDO, ilidividually, | FORM (DAMAGES) | ED VERDICI | | | |
| | Plaintiffs, | | | | | |
| 19 | VS. | Trial: September 10, 20 | 24 | | | |
| 20 | CITY OF REDDING; GARRETT | | | | | |
| 21 | MAXWELL, an individual; MATTHEW BRUCE, an individual; and DOES 2-10, | | | | | |
| 22 | inclusive, | | | | | |
| 23 | Defendants. | | | | | |
| 24 | | _ | | | | |
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| | | 1 | 2:22-cv-00585-WBS-JDP | | | |

PLAINTIFFS' PROPOSED VERDICT FORM (DAMAGES)

1 TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF 2 **RECORD**: 3 Plaintiffs VERONICA MCLEOD, individually and as successor in interest to decedent, 4 DOLORES HERNANDEZ and AMADO HERNANDEZ, individually and as successor in interest 5 to decedent, DOLORES HERNANDEZ ("Plaintiffs") hereby submit their Proposed Verdict Form 6 (Damages) pursuant to the Court's July 3, 2024, Final Pretrial Order. 7 8 Respectfully submitted, 9 DATED: August 20, 2024 LAW OFFICES OF DALE K. GALIPO 10 LAW OFFICE OF STEWART KATZ 11 12 /s/ Hang D. Le $\mathbf{B}\mathbf{y}$ Dale K. Galipo 13 Stewart Katz Hang D. Le 14 Attorneys for Plaintiffs VERONICA MCLEOD, AMADO HERNANDEZ, 15 and YSIDRA REGALDO 16 17 18 19 20 21 22 23 24 25 26 27 28 2:22-cv-00585-WBS-JDP

PLAINTIFFS' PROPOSED VERDICT FORM (DAMAGES)

Case 2:22-cv-00585-WBS-JDP Document 51 Filed 08/20/24 Page 3 of 4

| 1 | QUESTION 1 : What are Dolores Hernandez's damages? | | | | |
|---------|---------------------------------------------------------------------------------------------|-----------------------|--|--|--|
| 2 | | | | | |
| 3 | Pre-death pain and suffering; emotional distress | \$ | | | |
| 4 | emotional distress | | | | |
| 5 | Loss of life | \$ | | | |
| 6 | | | | | |
| 7 | QUESTION 2 : What are the Plaintiffs' wrongful death damages for the loss of Dolores | | | | |
| 8 | Hernandez? | | | | |
| 9 | | | | | |
| 10 | Plaintiff Veronic McLeod | | | | |
| 11 | Past loss of Dolores Hernandez's probable support, companionship, society, comfort, and | \$ | | | |
| 12 | consortium | | | | |
| 13 | Future loss of Dolores Hernandez's probable | \$ | | | |
| 14 | support, companionship, society, comfort, and consortium | | | | |
| 15 | | | | | |
| 16 | Plaintiff Amado Hernandez | | | | |
| 17 | Past loss of Dolores Hernandez's probable support, companionship, society, comfort, and | \$ | | | |
| 18 | consortium | | | | |
| 19 | Future loss of Dolores Hernandez's probable support, companionship, society, comfort, and | \$ | | | |
| 20 | consortium | | | | |
| 21 22 | | | | | |
| 23 | QUESTION 3 : What amount of punitive damages, if any, do you award? | | | | |
| 24 | | • | | | |
| 25 | Veronica McLeod | \$ | | | |
| 26 | Amado Hernandez | \$ | | | |
| 27 | | | | | |
| 28 | | | | | |
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| | 1 | 2:22-cv-00585-WBS-JDP | | | |

PLAINTIFFS' PROPOSED VERDICT FORM (DAMAGES)

Case 2:22-cv-00585-WBS-JDP Document 51 Filed 08/20/24 Page 4 of 4

| 1 | Please sign and date | this verdict form and return it to the Court. | |
|----|----------------------|-----------------------------------------------|-----------------------|
| 2 | Dated: | Signed: | |
| 3 | | Jury Foreperson | |
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| | | PLAINTIFFS' PROPOSED VERDICT FORM (DAMAGES) | 2:22-cv-00585-WBS-JDI |
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